

Pointdujour, Rachelle

From: Pointdujour, Rachelle
Sent: Monday, November 21, 2022 11:34 AM
To: 'Mark Dobronski'
Cc: Shroff, Armeen Mistry; Lund, Matthew J.
Subject: RE: Dobronski v. Family First Life LLC, et al. - Case No. 22-cv-12039

Mr. Dobronski,

We write to request your consent to a Motion to Dismiss pursuant to Rule 12(b)(6) that we intend to file on behalf of Defendants Emmanuel Chibuzor Igweh and Vanina E. Bonanno tomorrow. The legal bases for the motion are that Plaintiff lacks Article III standing, Plaintiff failed to plead facts that would allow the Court to reasonably infer that Defendants utilized an automated telephone dialing system, and Plaintiff fails to sufficiently plead vicarious liability under the TCPA.

Please confirm whether you concur with this Motion. Should you wish to discuss further, we are available to discuss.

Thank you,

Rachelle Pointdujour

Attorney

Direct: 212.704.6450 | Internal: 13-6450

rachelle.pointdujour@troutman.com

troutman pepper

875 Third Avenue
New York, NY 10022
troutman.com

Troutman Pepper is a Mansfield Certified Plus Firm

From: Mark Dobronski <markdobronski@yahoo.com>
Sent: Thursday, November 10, 2022 12:18 PM
To: Pointdujour, Rachelle <Rachelle.Pointdujour@troutman.com>
Subject: Re: Dobronski v. Family First Life LLC, et al. - Case No. 22-cv-12039

EXTERNAL SENDER

Ms. Pointdujour,

You have my consent to append my "e-signature" to the Stipulation and to file same with the Court.

Thank you.

Mark Dobronski